UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: John Brady

Jeanne Brady

Chapter: 13

Fay Servicing, LLC as servicer for

LSF8 Master Participation Trust

Movant

Debtors

Hearing Date: June 7, 2022 at 11:00 am

Case No.: 22-10314-amc

Judge: Ashely M. Chan

v.

Objection Deadline: May 30, 2022

John Brady Jeanne Brady

Kenneth E. West - Trustee
Respondents

NOTICE OF MOTION FOR RELIEF FROM AUTOMATIC STAY

Fay Servicing, LLC as servicer for LSF8 Master Participation Trust has filed a Motion for Relief from Stay with the Court in order to gain Court authority to foreclose on real property known as 5980 Mark Drive, Bensalem, PA 19020.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before May 30, 2022 (14 days after the date the notice was mailed) you or your attorney must do all of the following:
 - (a) file an answer explaining your position at

Clerk of Court
United States Bankruptcy Court
Robert N.C. Nix, Sr. Federal Courthouse
900 Market Street, Suite 400
Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Lauren M. Moyer, Esquire
Friedman Vartolo, LLP
1325 Franklin Avenue, Suite 160
Garden City, NY 11530
T: (212) 471-5100
F: (212) 471-5150
Bankruptcy@FriedmanVartolo.com

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on the 7th day of June, 2022 at 11:00 A.M., at Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Dated: May 16, 2022

By: _/s/ Lauren M. Moyer Lauren M. Moyer, Esquire FRIEDMAN VARTOLO LLP Attorneys for Movant 1325 Franklin Avenue, Suite 160 Garden City, New York 11530 T: (212) 471-5100 F: (212) 471-5150 Bankruptcy@FriedmanVartolo.com

TO:

Trustee

Kenneth E. West Office of the Chapter 13 Standing Trustee 1234 Market Street - Suite 1813 Philadelphia, PA 19107

Debtors' Counsel

Cameron Deane, Esquire Young, Marr, Mallis & Deane, LLC 3554 Hulmeville Road Suite 102 Bensalem, PA 19020

U.S. Trustee

United States Trustee Office of the U.S. Trustee 200 Chestnut Street Suite 502 Philadelphia, PA 19106

Debtors

John Brady 5980 Mark Drive Bensalem, PA 19020

Jeanne Brady 5980 Mark Drive Bensalem, PA 19020